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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

A.O., et al.,
Plaintiffs,
v.
TRACY RENAUD, et al.,
Defendants.

Case No. 19-CV-06151 SVK

**JOINT SETTLEMENT STATUS
REPORT AND DEFENDANTS'
REQUEST TO CONTINUE THE JULY
27, 2021 OSC HEARING AS
MODIFIED BY THE COURT**

The parties, through counsel, hereby submit this Joint Settlement Status Report and Defendants' Unopposed Request to Continue the July 27, 2021 OSC Hearing in response to the Court's June 7, 2021 Order to Show Cause re Settlement, Dkt. No. 133.

The parties are working as expeditiously as possible to consummate the settlement. On July 1, 2021, the parties' principal negotiators finished finalizing all documents related to settlement, including the Settlement Agreement, the Notice of Proposed Class Action Settlement, Notice of Final Settlement,

JOINT SETTLEMENT STATUS REPORT AND DEFENDANTS' REQUEST TO CONTINUE THE JULY 27, 2021 OSC HEARING AS MODIFIED BY THE COURT
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1 and Notice of Compliance Report -- subject to final review and approval by agency leadership, DOJ's
 2 Office of Immigration Litigation ("OIL") and the United States Attorney's Office ("USAO"). The
 3 Settlement Agreement resolves all issues in this case, including fees and costs.

4 On July 2, 2021, defense counsel sent the Settlement Agreement and the related documents to
 5 agency leadership for final review and approval. Defense counsel anticipates that they will receive the
 6 agency leadership's response by July 30, 2021. Defense counsel is optimistic that agency leadership
 7 will approve the Settlement Agreement and related documents because the principal negotiators
 8 attempted to address issues raised by agency leadership during the settlement negotiations.

9 Once agency leadership approves the Settlement Agreement and the related documents, defense
 10 counsel estimates that it will take OIL and USAO two additional weeks at the most to render their
 11 approvals. Defense counsel is optimistic that OIL and USAO will approve the Settlement Agreement
 12 because an OIL attorney (Ms. Masetta-Alvarez) was one of Defendants' principal negotiators, and an
 13 Assistant United States Attorney (Mr. Scharf) monitored the settlement process.

14 After all the necessary government approvals are obtained, the parties will promptly file a joint
 15 motion for preliminary approval of the Settlement Agreement, which will include a request for the Court
 16 to approve the putative class for purposes of settlement.

17 Accordingly, Defendants respectfully request the Court to continue the July 27, 2021 hearing to
 18 August 20, 2021, or any date thereafter as may be convenient to the Court. The requested continuance
 19 should provide the parties sufficient time to resolve any issues raised by agency leadership, OIL, or the
 20 USAO, and to file the joint motion for preliminary approval of the Settlement Agreement. Plaintiffs do
 21 not object to this request.

22 By way of further update, Elizabeth R. Veit is the OIL-DCS attorney handling this case while
 23 Katelyn Masetta-Alvarez is on leave.

24 Finally, the parties wish to thank again Magistrate Judge Ryu for the substantial amount of time
 25 and energy she devoted in facilitation of this settlement.

26 Dated: July 19, 2021

Respectfully submitted,

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A.O., A.S.R., L.C., R.M., and
I.Z.M., on behalf of themselves
and all others similarly situated

The Court continues the July 27, 2021 OSC hearing to **August 24, 2021 at 1:30 p.m.**

Dated: July 20, 2021


The Honorable Susan van Keulen
United States Magistrate Judge